

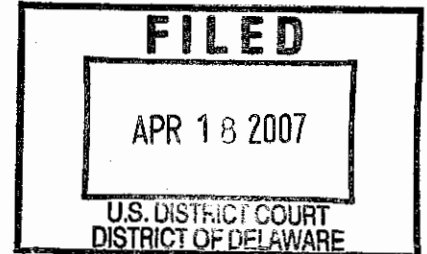
IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

GEORGE A. JACKSON,  
Plaintiff,

v.

STANLEY TAYLOR, et al.,  
Defendants.

C.A.No. 05-823-\*\*\*



PLAINTIFFS' REQUEST THAT DEFENDANTS PERMIT PLAINTIFFS  
ENTRY INTO THE S.C.I. MAIN KITCHEN UNIT FOR PURPOSE OF  
INSPECTION AND MEASURING, SURVEYING, PHOTOGRAPHING,  
TESTING THE OPERATION OF THE EXHAUST VENTILATION UNITS.

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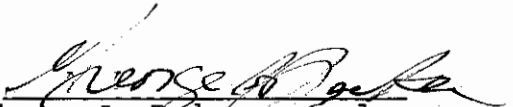
COME NOW Plaintiff George A. Jackson, et al., Plaintiffs' class,  
request pursuant Fed. R. Civ. P. Rule 34(a)(2), referring to Fed. R. Civ. P. Rule  
26(b), that Defendants permit Plaintiffs entry into the S.C.I. Main Kitchen Unit  
for purpose of inspection and measuring, surveying, photographing, testing the  
operation of the exhaust ventilation units, and state the following:

1. Plaintiff George A. Jackson, et al., representative of the Plaintiffs  
class, have worked in the S.C.I. Main Kitchen Unit between the years of 11/30/1992  
thru 6/27/2006.

2. The Plaintiff George A. Jackson is fully knowledgeable of the exhaust  
ventilation units in the S.C.I. Main Kitchen Unit. In fact, no DOC food service  
employee (Defendants Senato, Melvin, Manuel, Evans, White, Raynor, Atkins and Crockett)  
has work at the S.C.I. Main Kitchen longer than Plaintiff Jackson.

Plaintiff George A. Jackson, et al., request that Defendants or  
representatives of the Defendants permit Plaintiff entry into the S.C.I. main  
kitchen unit during non-operative hours for the purpose of inspection and measuring,  
surveying, photographing, testing the operation of the Exhaust ventilation units  
on the "old-side" and "new-side" of the kitchen area.

4. Plaintiff George A. Jackson, et al., also asked that he be provide with a camera to photograph said exhaust ventilation units.

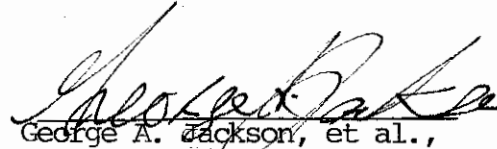
  
George A. Jackson, et al  
Sussex Correctional Institution  
P.O. Box 500  
Georgetown, DE 19947

DATED: 4/15/07

CERTIFICATE OF SERVICE

I hereby certify that on April 15, 2007, I filed the enclosed Document by placing in the S.C.I. prison, U.S. Mail box to be forward to:

Eileen Kelly  
Deputy Attorney General  
Department of Justice  
820 N. French St., 6th Fl.  
Wilmington, DE 19801

  
George A. Jackson, et al.,  
Sussex Correctional Institution  
P.O. Box 500  
Georgetown, DE 19947

DATED: 4/15/07

I/M: George A. Jackson Bldg: mer. 1  
SUSSEX CORRECTIONAL INSTITUTION  
P.O. BOX 500  
GEORGETOWN, DELAWARE 19947

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